

1  
2 LINGEL H. WINTERS, ESQ. (SBN 37759)  
3 LAW OFFICES OF LINGEL H. WINTERS  
A PROFESSIONAL CORPORATION  
4 One Maritime Plaza, Suite 400  
San Francisco, CA 94111  
Telephone: (415) 398-2941  
Facsimile: (415) 393-9887  
5

6 GIRARDI & KEESE  
THOMAS V. GIRARDI (SBN 36603)  
7 1126 Wilshire Blvd.  
Los Angeles, CA 90017-1904  
Telephone (213) 977-0211  
8

9 Attorneys for Plaintiff and the Putative Class

10  
11  
12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

IN RE TFT-LCD (FLAT  
PANEL)ANTITRUST LITIGATION

MDL No. M:07-cv-01827 SI

Case No. 07-cv-2796 SI

CLASS ACTION

DECLARATION IN SUPPORT  
OF MOTION FOR ORDER SHORTENING  
TIME

Date: July 10, 2007  
Time: 10:00 a.m.

Hon. Susan Illston  
Courtroom: 10

1 I, Lingel H. Winters, declare as follows:

2

3 1. I am an attorney duly licensed to practice law by the State of California and admitted to  
4 practice before this Court. I am principal and owner of the law firm of Lingel H. Winters  
5 P.C. and my firm along with my co-counsel Thomas V. Girardi of the law firm of Girardi  
6 & Keese serve as attorney of record for plaintiff EMW, Inc. The matters set forth herein  
7 are within my personal knowledge, and if called upon and sworn as a witness I could  
8 competently testify regarding them. I make this declaration pursuant to 28 U.S.C. sec.  
9 1746.

10

11 2. On April 17, 2007, the Panel on Multi-District Litigation transferred MDL Docket No.  
12 1827 *In Re TFT-LCD (Flat Panel) Antitrust Litigation* to the Northern District of  
13 California and assigned to the Honorable Susan Y. Illston. In its order, the MDL Panel  
14 stated: "We conclude that the Northern District of California is an appropriate transferee  
15 forum in this docket because over 50 of the actions of which the Panel has been notified  
have been brought in that district..."

16

17 3. On May 30, 2007 Lingel H. Winters P.C. filed the related case of *EMW, Inc. on behalf of*  
18 *itself and all others similarly situated v. LG Philips LCD CO., LTD et al.* Case No. C-  
19 07-2796 SI in the Northern District of California alleging conspiracies to restrain trade in  
the market for TFT-LCD products.

20

21 4. On June 4, 2007 plaintiff filed its Reply Memorandum Indirect Purchaser Leadership  
22 Proposal of Lingel H. Winters P.C., in the belief that the June 8, 2007 hearing date for  
23 motions was firm.

24

25 5. On June 5, this Court continued all pending motions herein to July 10, 2007

26

27 6. On June 7, 2007 Lingel H. Winters P.C. filed an Administrative Motion to Consider  
Whether Cases Should Be Related.

28

1       7. and found and calculated a combined population for the Repealer States of 58,041,000.

2              By contrast, said reference book stated that the population of the State of California was

3              31,431,000 persons.or 35% of the total Repealer state populations are in California

4       8. On June 19, 2007, Thomas V. Girardi, Esq. of Girardi & Keese agreed to join Lingel H.  
5              Winters P.C. as co-counsel representing EMW, Inc. and the putative class of California  
6              Indirect Purchasers of TFT-LCD.

7       9. Lingel H. Winters P.C. was a member of the Executive Committee in *In Re Microsoft*  
8              J.C.C.P. No. 4106, 143 Cal. App. 4<sup>th</sup> 706 which resulted in a settlement for California  
9              indirect Purchasers valued at \$1.1 Billion, 2/3 of the unclaimed portions of which were  
10             set aside for underprivileged California schools.

11       10. I have diligently sought to place before the Court plaintiff's Motions, and to streamline  
12             the Court's case management with an eye to judicial economy.

13       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
14             true and correct. Executed June 21, 2007 in San Francisco, California.

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

  
/s/ Lingel H. Winters

Lingel H. Winters